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April 28, 2016

Miriam Weizenbaum, Esquire
DELUCA & WEIZENBAUM, LTD.
199 North Main Street
Providence, RI 02903

Re: Wanda Ovalles, et al. v. Sony Electronics, Inc., et al
USDC Rhode Island, C.A. No.: 1:14-00137-M-PAS

Dear Miriam,

Enclosed are SEL's responses and objections to the 30(b)(6) deposition notices. As we discussed during our telephone conversation Monday, Mr. Posse is going to be the designee for the subject matters of inquiry. He and Jim Campbell are available to complete Mr. Posse's individual deposition, and for these 30(b)(6) depositions, on May 24th and 25th. Please let me know if you wish to proceed with the 30(b)(6) depositions limited to and consistent with the scope of subject matters as described in the attached responses. Also, Rule 30(d)(2) limits the time frame for Rule 30(b)(6) depositions to 7 hours per designee and Mr. Posse has already been deposed for 1 day, so that will have to be taken into account. If you decide not to proceed with the depositions, we will have to move for a protective order and request that it be heard at the hearing on the plaintiffs' motion to compel on June 9th.

Thank you for agreeing to travel to San Jose, California for Mr. McCaul's deposition since that is where he works and resides. However, he is not available for the deposition on May 23rd which is the date selected in the deposition notice you served after our telephone conversation on Monday. I will coordinate with him so that we can offer alternative dates in June.

Please feel free to give me a call to discuss these issues further.

Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "David M. Rogers".

David M. Rogers

DMR:jav
Enclosures



cc: William J. Ronalter, Esquire
Thomas C. Angelone, Esquire
John F. Kelleher, Esquire (w/out enc.)
Robert J. Hafner, Esquire (w/out enc.)
James M. Campbell, Esquire (w/out enc.)
Diana A. Chang, Esquire (w/out enc.)